

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

v.

SHOICHI OKADA,

Defendant.

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Cause No. 4:14CR00361 CDP/NAB

**MOTION TO ALLOW UNSUPERVISED
CONTACT WITH SON**

Comes now Defendant, Shoichi Okada, by and through counsel, and hereby moves this Court pursuant to 18 U.S.C. § 3145(a)(2) to modify the conditions of release previously imposed to permit him to have unsupervised contact with his three year old son so that his wife can maintain a full time job in order to support his family. In support of this motion, Defendant states as follows:

1. Defendant is charged with one count of possession of child pornography in violation of 18 USC § 2252A(a)(5)(B).
2. The Defendant has been on bond since November 4, 2014 and regularly reports to Pre-trial Release as a condition of his bond.
3. The Defendant has had no violations of his pre-trial release conditions.
4. The Defendant lost his employment with Barnes Jewish Hospital once this case was charged and he is currently on unpaid, administrative leave.
5. The Defendant currently lives with his wife and their only child, a three year old son.

6. Prior to this case being charged, the Defendant was the sole breadwinner and means of financial support for his family. His wife stayed home on a consistent basis and provided childcare for their son while the Defendant worked as a physician.

7. The Defendant is not currently working and unable to find alternate employment.

8. The Defendant's wife recently obtained employment at the Missouri Foundation for Health working as a Health Policy Analyst. Her start date is not until April 15, 2015. Although the job does not necessarily require her to travel out of the immediate area the job is located in downtown St. Louis and is a full time position.

9. The Defendant is confident that his wife's anticipated income will allow his family to continue paying their bills in a timely manner and provide adequate support for the household. However, the Defendant needs to take over most of the family childcare duties for his three year old son since his wife is going to be working full time starting on April 15, 2015.

10. Currently, one of the bond conditions in this case is that the Defendant have no unsupervised contact with minors or be the only adult in the presence of minor children. The Defendant is unable to effectively care for his son while his wife works with this bond condition in place.

11. Although the Defendant understands and accepts this condition as a standard condition in these types of cases, he needs to be able to have contact with his son on a consistent and daily basis so that his wife can work.

12. The Defendant is only requesting that he be allowed to have unsupervised contact with his three year old son in order to watch him on a daily basis while his wife works to earn income to support the family.

13. The Defendant is not requesting permission to have contact with any other children.

14. There are no prior allegations against the Defendant pertaining to his son.

15. The Defendant's son is not one of the potential victims in this case.

16. Undersigned counsel has discussed this request with Pre-Trial Services Officer Tiffany Corley. She has no objection to this request.

17. The Defendant is willing to abide by any additional conditions of bond that this Court may deem necessary in order to approve this request.

WHEREFORE, for the foregoing reasons, the Defendant respectfully requests that the Court grant him permission to have unsupervised contact with his son so that his wife can maintain employment and support his family.

FRANK, JUENGEL & RADEFELD,
ATTORNEYS AT LAW, P.C.

By: /s/ Daniel A. Juengel
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CERTIFICATE OF SERVICE

I hereby certify that on March 30, 2015, the foregoing was filed electronically with the Clerk of the Court to be served by operation of the Court's electronic filing system upon the following.

Mr. Robert Livergood
Asst. United States Attorney
111 South Tenth Street, 20th Floor
St. Louis, Missouri, 63102

By: /s/ Daniel A. Juengel
DANIEL A. JUENGEL